

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JOHN D. KNABB, III and TRACY L.  
KNABB, individually and as Parents and  
Natural Guardians of JOANNE D.  
KNABB, a minor

CIVIL ACTION NO. 04-215 Erie

Plaintiffs,

vs.

INTERNATIONAL BIOMEDICAL, INC.,  
a Texas Corporation, t/d/b/a Airborne Life  
Support Systems,

Defendant and  
Third Party Plaintiff

vs.

STEPHEN G. WOODS, Administrator of  
the ESTATE OF JOHN E. BRIDGE,  
Deceased; CHILDREN'S HOSPITAL OF  
PITTSBURGH; and GUARDIAN ANGEL  
AMBULANCE SERVICE, INC.,

Third Party  
Defendants.

**MOTION TO AMEND CASE MANAGEMENT ORDER TO EXTEND TIME IN  
WHICH TIME TO FILE MOTION FOR SUMMARY JUDGMENT**

AND NOW comes Third Party Defendant, Children's Hospital of Pittsburgh, by and through its attorneys, Dickie, McCamey & Chilcote, P.C., and Andrew G. Kimball, Esquire and Kristen Hock Prex, Esquire and file the within Motion to Amend Case Management Order to Extend Time in Which to File Motion for Summary Judgment and in support thereof avers as follows:

1. This action stems from an unfortunate automobile – ambulance collision that occurred on or about February 23, 2003. Summarily, Third-Party Defendant,

Stephen G. Woods (“Woods”), deceased, was allegedly operating his automobile under the influence of alcohol when he veered across the center line of a particular roadway and struck, head-on, an ambulance en route to Children’s Hospital of Pittsburgh (“Children’s”), in Pittsburgh, Pennsylvania. That collision allegedly rattled an isolette that was holding Plaintiff’s minor, Joanne D. Knabb, a three-day old infant experiencing heart complications, and caused her to be thrown from that isolette and to sustain injuries.

2. The foregoing summary of facts encouraged Plaintiffs, *inter alia*, to commence this action against International Biomedical, Inc. (“IBI”), the manufacturer of the involved isolette.

3. IBI, subsequently, joined, as Third Party Defendants, Woods, Children’s, and Guardian Angel Ambulance Services, Inc. (“Guardian”).

4. Third Party Defendant, Children’s, intends to file a Motion for Summary Judgment.

5. The deadline for filing such a motion is April 5, 2006 by this Honorable Court.

6. The deadline for filing of Third Party Plaintiffs’ Pretrial Statement is April 25, 2006 by this Honorable Court.

7. Third Party Defendant, Children’s, anticipates expert reports to be included in Third-Party Plaintiffs’ Pretrial Statement.

8. It would promote economy and efficiency if Third Party Defendant, Children’s had access to such reports prior to filing its Motion for Summary Judgment.

WHEREFORE, Third Party Defendant, Children's Hospital of Pittsburgh, requests its Motion to Amend Case Management order to Extend Time in Which to File Motion for Summary Judgment on or before May 5, 2006 be granted.

Respectfully submitted,

DICKIE, MCCAMEY & CHILCOTE, P.C.

By: /s/ Kristen Hock Prex  
Andrew G. Kimball, Esquire  
Kristen Hock Prex, Esquire  
Attorneys for Third Party Defendant,  
Children's Hospital of Pittsburgh

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31<sup>st</sup> day of March, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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DICKIE, McCAMEY & CHILCOTE, P.C.

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